

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-4 are pending in the application, and are amended by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.<sup>1</sup> No new matter is presented.

In the Office Action, Claims 1-4 were rejected under 35 U.S.C. § 112, second paragraph; and Claims 1-4 were rejected under 35 U.S.C. § 102(e) as anticipated by Neves (U.S. Pub. 2006/0276209).

Claims 1-4 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. The Office Action asserts that “[i]t is unclear what address is being converted, what the address is being converted to, and what the conversion is based on.” Applicants respectfully traverse this assertion as it is clear that the claimed “conversion” is performed on an address, and the conversion is based on the “address conversion information” (e.g., tables) stored in the respective routers.

For example, at a source router (e.g., 10A in Fig. 1), a destination address (#X1) of data received from a source mobile station (e.g., mobile station 1) is converted to a destination address (#Y1) of a specific router (e.g., 10F in Fig. 1) based on second address conversion information (e.g., information stored in cache 12a of router 10A). At the specific router, the destination address (#Y1) of the data is converted to a destination address (#X1) of a destination mobile station (e.g., mobile station 2) based on first address conversion information (e.g., stored in cache 12a of router 10F). The claimed features directed to the address conversion based on the address conversion information are also discussed in more detail below. Therefore, Applicants respectfully submit that Claims 1-4 clearly recite that

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<sup>1</sup> E.g., specification, p. 11, ll. 24-29 and p. 12, ll. 7-13.

one address is being converted into another address, and that the conversion is based on address conversion information at the routers.

Accordingly, Applicants respectfully request that the rejection of Claims 1-4 under 35 U.S.C. § 112, second paragraph, be withdrawn.

Claims 1-4 were rejected under 35 U.S.C. § 102(e) as anticipated by Neves. In response to this rejection, Applicants respectfully submit that amended independent Claims 1-4 recite novel features not taught by Neves.

Independent Claims 1-4 relate to a communication control system in which data addressed to a destination mobile station is transmitted via a source router (e.g., 10A in Fig. 1), a specific router (e.g., 10F in Fig. 1) and a destination router (e.g., 10D in Fig. 1) connected by a destination mobile station. Claim 1, for example, recites that a router controller of the routing controller (e.g., 30 in Fig. 1) determines the specific router (10F in Fig. 1) based on topology information of a plurality of routers controlled by the routing controller and a routing path of the data addressed to the destination mobile station (e.g., mobile station 2), when a trigger receiver receives the predetermined trigger. An address conversion information processing requester of the routing controller requests the source router to create second address conversion information (e.g., stored in cache 12a of router 10A) for converting a destination address of the data from address information of the destination mobile station (#X1) to the address information routed to the specific router (#Y1). The address conversion information processing requester of the routing controller also requests the specific router to create first address conversion information (e.g., stored in cache 12a of router 10F) for converting the destination address of the data from the address information routed to the specific router (#Y1) to the address information of the destination mobile station (#X1).

Independent Claims 2-4, while directed to alternative embodiments, are amended to recite similar features. Accordingly, the remarks and arguments presented below are applicable to each of independent Claims 1-4.

Turning to the applied reference, Neves describes a location-independent packet routing system in a short-range wireless networking environment. Neves' system includes a Home Agent Masquerader (HAM) and a Foreign Agent Masquerader (FAM), and the location of the HAM may be moved to be close to a physical location of a client.

More particularly, Neves describes that a roaming coordinator 320 requests the HAM (e.g., source router) to create a HAM conversion record for converting destination address information of the received response data from the masquerade IP address to the address of the FAM (e.g., address of the destination router).<sup>2</sup> The roaming coordinator then requests the FAM (e.g., destination router) to create a FAM conversion record for converting destination address information of the received response data from the FAM address to the client address of the destination mobile station.<sup>3</sup>

Thus, Neves describes that the roaming coordinator 320 requests the source router HAM connected by a server and the destination router FAM connected by a client to create the address information for converting/reconverting the address of the client and the address of the destination router HAM for an adequate routing of data addressed to the client from the server, even when the client is roaming.

Neves, however, is not directed to changing a routing path of data addressed to the destination mobile station in accordance with a predetermined trigger such as an occurrence of network congestion and/or a detection of data requiring accounting. Therefore, Neves fails to teach or suggest "*a router controller configured to determine the specific router based on topology information of a plurality of routers controlled by the routing controller and a*

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<sup>2</sup> Neves, S735 in Fig. 7 and paragraph [0066]; S1060, S1065 in Fig. 10 and paragraph [0082].

<sup>3</sup> Id., S760 in Fig. 7 and paragraph [0067]; S1220, S1250 in Fig. 12 and paragraph [0089].

***routing path of the data addressed to the destination mobile station, when the trigger receiver receives the predetermined trigger,” as recited in independent Claims 1-4.***

Therefore, it also follows that Neves fails to teach or suggest a routing controller that ***requests the source router*** connected by the source mobile station and the determined specific router ***“to create second address conversion information for converting a destination address of the data from address information of the destination mobile station to the address information routed to the specific router,”*** which is also a feature recited in independent Claims 1-4.

Accordingly, Applicants respectfully request that the rejection of Claims 1-4 under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-4 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early a favorable reconsideration of the application is therefore requested.

Respectfully submitted,

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